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8 IN THE UNITED STATES DISTRICT COURT
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10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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13 UNITED STATES OF AMERICA,) No. CR 13-00580 RMW
14 vs.)
15 TRI MINH DAO,)
16 Defendant.)
17 _____)

18 **STIPULATION**

19 Defendant Tri Minh Dao, by and through Assistant Federal Public Defender Rita
20 Bosworth, and the United States, by and through Assistant United States Attorney Gary Fry,
21 hereby stipulate that, with the Court's approval, the change of plea hearing currently set for
22 August 31, 2015, at 9:00 a.m., shall be continued to September 14, 2015, at 9:00 a.m.

23 The reason for the requested continuance is that the parties have not finalized the plea
24 agreement yet. Mr. Dao does intend to change his plea at the next appearance and the parties
25 have agreed upon terms, but the government is still awaiting final approval of the language of
26 the plea agreement. In order to assure that Mr. Dao has enough time to review the agreement
with counsel prior to his hearing, the parties jointly request a brief continuance.

27
28 Stipulation to Continue Hrg.;
29 [] Order
30 No. CR 13-00580-RMW

1 The parties agree that the time between August 31, 2015, and September 14, 2015, is
2 excludable under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), for effective
3 preparation by defense counsel.

4 IT IS SO STIPULATED.

5 || Dated: August 26, 2015

6 s/
7 RITA BOSWORTH
Assistant Federal Public Defender

|| Dated: August 26, 2015

s/
RITA BOSWORTH
Assistant Federal Public Defender

18 Assistant United States Attorney

12 GOOD CAUSE APPEARING, upon stipulation of the parties, IT IS HEREBY
13 ORDERED that the status hearing shall be continued from August 31, 2015 to September 14,
14 2015 at 9:00 a.m.

15 It is further ordered that the time from August 31, 2015, and September 14, 2015, shall be
16 excluded from the computation of time within which trial shall commence under the Speedy
17 Trial Act, as the reasonable time necessary for effective preparation of counsel, pursuant to Title
18, United States Code Section 3161(h)(7)(A) and (h)(7)(B)(iv).

19 || IT IS SO ORDERED.

20 || Dated: 10/01/2015

Ronald M. Whyte
THE HONORABLE RONALD M. WHYTE
United States District Court Judge

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] Order
No. CR 13-00580-RMW